March 17, 2016

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket No. 12-268

Dear Ms. Dortch:

On November 6, 2015, Digital Tech Consulting, Inc. (DTC) submitted an analysis examining the challenges associated with a nationwide repack of television broadcasters following the upcoming incentive auction.[1] Our report considered the tasks associated with repacking broadcast television stations, the number of stations that are likely to be repacked, and the availability of resources that will be needed during the post-auction transition. In response, on February 17, 2016, T-Mobile submitted a report that appears to work backwards from the FCC's 39-month repacking deadline and $1.75 billion repacking budget to reach its conclusions, rather than comprehensively analyzing the steps involved in the repacking process.[2] T-Mobile's report reflects a number of flawed assumptions and conclusions.

First, T-Mobile erroneously assumes that antennas identified as "broadband" are capable of transmitting on all contiguous channels within all or a portion of the UHF band without modification. This is inaccurate, and reflects T-Mobile's failure to research the capabilities of these antennas. In fact, most of these antennas will need significant alterations, which cannot be performed while the antennas remain on towers, to operate on new channels. As a result, T-Mobile meaningfully underestimates the scope of antenna removal and installation work the transition will require.

Second, T-Mobile overstates the availability of critical resources, including tower crews with the equipment and experience qualifying them to perform broadcast antenna installation and removal work. T-Mobile claims to have identified 41 qualified tower crews capable of performing this work. In fact, based on our interviews with the additional companies T-Mobile identified, some of these companies have not performed broadcast work in more than a decade, some lack necessary specialized rigging equipment, and some specialize in radio, microwave and cellular antenna installations. Many broadcasters have never heard of some of these additional companies, and will not trust them to perform hazardous work on their critical facilities.

Third, T-Mobile asserts that DTC understated the capacity of antenna manufacturers to meet a surge in demand for broadcast television antennas. In fact, only two manufacturers supply antennas to 89 percent of the full power television market. These manufacturers confirm that

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[1] Letter from Myra Moore to Marlene H. Dortch, GN Docket No. 12-268 (Nov. 6, 2015).

[2] Letter from Trey Hanbury to Marlene H. Dortch, GN Docket No. 12-268 (Feb. 17, 2016).

typical lead times will range from 12 to 24 weeks for design, modeling, manufacturing and testing of antennas, that lead times are likely to lengthen when a large number of orders are placed simultaneously, and that they are unlikely to significantly increase capacity until they have a sufficient number of orders in hand to warrant expansion.

All three of these issues, as well as numerous other errors and inaccurate assumptions, are discussed in greater detail in the attached response to T-Mobile's report.

Respectfully Submitted,

Myra Moore

Myra Moore
President
Digital Tech Consulting, Inc.